

START

DON'T SAY --- Write It!

DATE: November 3, 1994

TO: J.K. Bartz	GSSC	R3-82
R.M. Carosino	RL	A4-52
D.L. Duncan	EPA	Seattle- HW-106
O.A. Farabee	RL	A6-55
R.G. Hastings	RL	N1-39
R.N. Krekel	RL	A5-15
P.J. Mackey	WHC	B3-15
S.E. McKinney	Ecology	Lacey
S.W. Petersen	WHC	H6-23
R.D. Pierce	WHC	T3-04
S.M. Price	WHC	H6-23
F.A. Ruck III	WHC	H6-23
J.A. Seamans	WHC	N2-04
W.E. Toebe	WHC	H6-22
J.L. Waite	WHC	B2-35
J.J. Wallace	Ecology	Kennewick
GHL/RCRA File	WHC	H6-23

FROM: Z.C. Knaus

Telephone: 373-6823

cc:

SUBJECT: Missing draft copy of NODs from Ecology (S.E. McKinney).

This attachment was left off from the November 17, 1993 Unit Managers' Meeting minutes for 105-DR. Please attach the following Notice of Deficiency (NOD) List to your copy of the November 17, 1994 UMM minutes for 105-DR.

54-3000-101 (9/59) {EF} GEF015
D.S.I.



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In	Zach Knowles
Co.	RCRA closures
Dept.	Scott McKinney
Fax #	

DRAFT

Notice of Deficiency
for the 105-DR Large Sodium Fire Facility
Closure Plan, Revision 1, dated 6/28/93

General Comments

Table 7-2 states that at least one samples will be taken from each of the listed sampling locations. For sound sampling practices, at least two samples should be collected from each of the listed points. Under most circumstances more samples are desirable, but due to the limited amount of contamination at this facility, combined with the low hazard presented by it, two samples will be sufficient.

Several major areas of the facility will be closed in conjunction with either a RCRA past practice unit, CERCLA operable unit, or 105-DR reactor D & D. However, there is no mention made in the closure plan as to how these portions of the facility will be monitored and secured during the interim. A section should be added to chapters 6 and 7 that outlines the activities that will occur during this interim period. For example, when the gravel scrubber is removed and disposed, how will the access to the tunnel be closed to prevent intrusion by either humans, animal life, rainwater, etc.? What steps will be taken to protect human health and the environment while these portions are held for later remediation?

Page/line	Comment
2-1/29	The units of measure given in this sentence do not make sense. The text is describing a cubicle, but the measurements are given in square feet. Judging by the numbers presented it should be cubic feet (3,743 square feet in area is larger than the entire 105-DR large fire room). Correct the measurements and units.
2-1/35	This line appears to have the same problem (i.e. volume presented as square feet). Correct the measurements and units.
6-1/43	Health-based levels are discussed. The health-based cleanup levels will be determined by using the Model Toxics Control Act (MTCA), method A or method B process, as referenced by WAC 173-303. Reference doses for carcinogens under MTCA are derived from the IRIS database.
7-2/46	For each of the two fire rooms and the exhaust fan room, add two authoritative samples of visible deposits on the walls, floor, or ceiling. It is possible, even likely, that random sampling will miss the obvious areas with visible contamination on them. Authoritative sample points will be decided by the sampling team during sampling.

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- 7-3/40 The water released to the 116-DR-8 crib is reported to have been below the pH level of 12.5. Are there documents that verify this? If there are, then an argument could be made that this crib did not receive wastes from the 105-DR facility, and therefore does not need to be considered within this closure plan. Please provide any documentation of the pH levels, as well as any other chemical data, of waste water released to the crib as early as possible.
- 7-4/2 At least two samples should be taken from the soil, based on best sampling practices. The samples should be analyzed for total sodium and lithium at least, if not the Target Analyte List (TAL). These levels will be compared to sitewide background levels for statistically elevated levels of these two constituents.
- 7-4/42 This statement is unclear. Is it intended to state that all sampling events will be appropriately documented, and that any changes to the sampling plan will also be noted? Please clarify this section.
- 7-5/33 This line states that sampling times in SW-846 will be used as goals. The requirements in SW-846 must be adhered to in order to make the analyses valid. This section must be reworded to reflect the SW-846 requirements.
- 7-6/24 ~~Specific test methods for lithium?~~
- 7-6/46 Add to this sentence: "...or the Unit Managers believe that a constituent may exceed the TCLP limits."
- 7-7/5 This sentence has a typo. Change the word detection to designation.
- 7-9/45 There is a reference here to WAC 173-303-075. This appears to be in error. The reference should be to WAC 173-303-180 and -190 (Manifest and Preparing dangerous waste for transport, respectively).
- 7-10/34 How will the rinsate be disposed? Provide the various disposal scenarios for the rinsate, depending on the designation status.
- 7-11/4 This section should include partial closure, in addition to final closure.
- 7-11/27 Ecology must receive a copy of the survey plat as well.